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March 10, 2022

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VIA ECF

Honorable Lorna G. Schofield United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 1106 New York, NY 10007

Re: Access Business Group International, LLC et al v. Refresco Beverages US Inc., No.

1:21-cv-10779-LGS.

Dear Judge Schofield:

We represent Defendant Refresco Beverages US Inc. ("Refresco") in the above-captioned matter. We write pursuant to Local Rules 7.1(d) and 5.2(b) and Your Honor's Individual Rule B.2 to respectfully request a brief adjournment of the initial conference scheduled for March 16, 2022 at 4:30 pm. Counsel for Plaintiff, Edward J. Bardelli, consents to this request for an adjournment.

Counsel for Refresco will be out of town on a personal matter in a different time zone when the initial conference is scheduled to take place. We therefore respectfully ask the Court to postpone the initial conference until substantially the same or a similar time (4:30 pm) any day the following week, or thereafter, that suits the Court's convenience. There have been no prior requests for an adjournment of this conference.

Respectfully

Edwin M. Baum

cc: Edward Bardelli (Counsel for Plaintiff) via email and ECF

The application for an adjournment is **GRANTED**. The initial pretrial conference scheduled for March 16, 2022, is **adjourned** to **March 23, 2022**, at **4:30 p.m.**, on the following conference line: 888-363-4749, access code: 558-3333. By **March 16, 2022**, the parties shall re-file the proposed case management plan and joint letter. The Clerk of Court is respectfully directed to close the motion at Docket No. 14.

Dated: March 11, 2022

New York New York

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE